

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Nadire Atas

22-CV-00853-LTS

Plaintiff

JURY TRIAL

against

The New York Times Company d/b/a The New York Times

Ellen Pollock

Lily Meier

Kashmir Hill .

Aaron Krolik

THE DAILY PODCAST,

Michael Barbaro

Dr. Todd Essig

John Does 1 through 20,

XYZ Corporations 1 through 10,

Defendants

OPENING

1. The actions arises out of false and defamatory statements published about the Plaintiff, Ms Atas , that she is a mentally ill woman who has been on a three decades long

vengeance of posting tens of thousands of internet posts about hundreds of people on the internet

INTRODUCTION - NATURE OF THE ACTION

2. On January 30, 2021, a story was published about the Plaintiff, Ms Atas by Kashmir Hill as the credited author with the headline “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> . An abbreviated version with the headline “ Attacked By A ‘superspreader’ Of Online Smears “ was published the following day in the print version of The Times
3. On February 9, 2021, a story was published about the Plaintiff, Ms Atas by Kashmir Hill as the credited author with the headline “ Woman Accused Of Defaming Dozens Online Is Arrested ” n the New York Times website at nytimes.com on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> . An abbreviated version with the headline “ Canadian Woman Cited In Online Attacks Is Arrested ” was published the following day in the print version of The Times

4. On April 24, 2021, a story was published about the Plaintiff, Ms. Atas by Kashmir Hill and Aaron Krolik as the credited authors of the story with the headline “The Slander Industry” on the New York Times website at [nytimes.com](https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.html) on April 24, 2021 at the URL <https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.html> and published on the front page of the New York Times on April 26, 2021 with the headline “The Reputation Business Has a Dirty Secret”
5. Defendant Kashmir Hill published a link to “A Vast Web of Vengeance” at <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> on her twitter and linkedin accounts with additional statements
6. Defendant Kashmir Hill published a link to “Woman Accused Of Defaming Dozens Online Is Arrested” at <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> on her twitter account with additional statements
7. Defendant the New York Times published a link to “A Vast Web of Vengeance” at <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> on the New York Times twitter accounts with additional statements
8. Defendant the New York Times published a link to “A Vast Web of Vengeance” at <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> on the New York Times facebook account with additional statements

9. On February 17, 2021, Defendant Kashmir Hill published false and defamatory statements on the The Current with Matt Galloway on CBC radio to third parties
10. On April 6, 2021, Defendant Kashmir Hill published false and defamatory statements on the podcast The Daily with Michael Barbaro Defendant Kashmir Hill to third parties
11. On May 3 , 2021, Defendant Kashmir Hill published false and defamatory statements on the podcast The Daily with Michael Barbaro to third parties
12. On April 26, 2021 , Defendant Kashmir Hill and Defendant Aaron Krolik published false and defamatory statements on the webcast In Lieu of Fun to third parties

THE PARTIES

13. Plaintiff Nadire Atas (“ Ms. Atas ”), is an individual ,. She is a natural person over the age of eighteen, a private citizen of Canada and domiciled in Toronto Ontario Canada .
14. Defendant The New York Times Company d/b/a The New York Times is a publicly traded New York corporation with its principal place of business at The New York Times Building, 620 Eighth Avenue, New York, New York. It publishes The New York Times, which has the third largest circulation of any U.S.-based newspaper.
15. Defendant Ellen Pollock is an editor of The New York Times. She is a citizen of the State of New York and is domiciled in New York State. She is a natural person over the age of eighteen,
16. Defendant Lily Meier daughter of Defendant Ellen Pollock. She is a citizen

of the State of New York and is domiciled in New York State . She is a a natural person over the age of eighteen,

17. Defendant Kashmir Hill is the credited author of “ A Vast Web of Vengeance” , "Woman Accused of Defaming Dozens Online Is Arrested" and “ The Slander Industry” . She is a citizen of the State of New York and is domiciled in New York State . She is a natural person over the age of eighteen, and is, and/or at all relevant times was, an employee, officer, director and/or agent of The York Times as a reporter of The New York Times.

18. Aaron Krolik is the credited author of “ The Slander Industry” . He is a citizen of the State of New York and is domiciled in New York State . He is a natural person over the age of eighteen, and is, and/or at all relevant times was, an employee, officer, director and/or agent of The York Times as a reporter of The New York Times.

19. Defendant THE DAILY PODCAST, The Daily is a daily news podcast and radio show by the American newspaper The New York Times. Hosted by Times political journalist Michael Barbaro, its episodes are based on the Times' reporting of the day with interviews of journalists from the New York Times.

20. Defendant Michael Barbaro is a political journalist for the Times and is the host of the THE DAILY PODCAST . He is a citizen of the State of New York and is domiciled in New York State. He is a natural person over the age of eighteen, and is, and/or at all relevant times was, an employee, officer,

director and/or agent of The York Times as a political journalist for the Times and is the host of the THE DAILY PODCAST

21. Defendant Dr. Todd Essig is a clinical psychologist and psychoanalyst, He is a citizen of the State of New York and is domiciled in New York State. He is a natural person over the age of eighteen,

22. At all times relevant hereto, the defendants, John Does 1 through 10, are fictitious names used to identify those individuals whose names are presently unknown to Plaintiff including, but not limited to , employed and not employed by The New York Times, publishers, editors, journalists, reporters, writers, videographers, advisors, consultants, officers, managers, owners, principals, employees, agents and/or other duly authorized individuals who caused or contributed to the causes, incidents or events for which Plaintiff seeks damages, and/or are vicariously or otherwise liable for the acts, commissions, or other culpable conduct of those who did cause or contribute to the causes, incidents or events alleged herein.

23. At all times relevant hereto, the defendants, XYZ Corporations 1 through 10, are corporate entities presently unidentifiable to Plaintiff, including, but not limited to, employers or employees of any of the Defendants, media outlets, news stations, publication companies, and/or other duly authorized corporate entities or affiliates who caused or contributed to the incident or incidents for which Plaintiff seeks damages, and/or are vicariously and/or otherwise liable for the acts, commissions, or other culpable conduct of those who did cause or contribute to the causes, incidents, or events alleged herein.

VENUE AND JURISDICTION

24. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 because it arises under the federal common law and a cause of action ‘arises under’ federal law if the dispositive issues stated in the complaint require the application of the federal common law
25. This Court also has subject-matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a).
26. There exists complete diversity of citizenship between Plaintiff and the Defendants
27. The amount in controversy greatly exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interests, costs, and attorneys’ fees, as required to sustain subject-matter jurisdiction in this Court.
28. This Court has personal jurisdiction over Defendants pursuant to New York Civil Practice Law and Rules § 301 (“CPLR”) because The Times has offices and its principal place of business in New York, New York, and the causes of action alleged herein arise out of The Times’ activities in New York, New York. This Court also has personal jurisdiction over The Times under CPLR § 302(a) because this action arises out of the Defendants’ transaction of business in New York, New York.
29. Venue properly lies within this judicial district pursuant to 28 U.S.C. § 1391 1391(b)(2) because a substantial portion of the events giving rise to the claims asserted in this action occurred in this judicial district

30. The defamatory statements that form the basis of this lawsuit were published to and in New York , in addition to all over the world.

SATISFACTION OF CONDITION PRECEDENT

31. The Plaintiff provided notice to the Defendant The New York Times. All conditions precedent to the filing and maintenance of this action have been performed, have occurred or have been waived. The Defendant The New York Times has not complied with the Plaintiff's demands for retractions of the defamatory statements by way of publishing any such retractions. Instead, and as confirmed by letter dated January 26, 2022 , The New York Times refused to comply, ratifying its position

MS ATAS IS A PRIVATE FIGURE

32. Ms. Atas is a private figure for the purposes of this defamation action, having lived her entire life outside of the public eye.
33. Ms. Atas had no notoriety of any kind in the community at large.
34. Ms. Atas did not, by any voluntary act, involve herself in any particular and identifiable public controversy.
35. Ms. Atas did not involve herself publicly to the extent that she either assumed a role of public prominence or was in a position to influence others or the outcome of any identifiable public controversy.
36. Ms. Atas has never enjoyed regular and continuing access to the media.
37. Ms. Atas made no public appearances

38. Prior to the Times' January 30, 2021 story , Ms. Atas had issued no public statements and made no media appearances.

A BRIEF BACKGROUND

The summary of the four (4) defamation actions in Toronto, Ontario Canada

39. Court File No.: CV-10-400035. Lingered for nine 9 years without any steps being taken.

The sole Plaintiff STANCER GOSSIN ROSE LLP, dissolved and company permanently closed in June 2019. Justice D.L. Corbett ignored this and proceeded with the motions in November and December 2019 for summary Judgment

40. Court File No.: CV-16-544153. Ms Atas filed an affirmative defense . Plaintiff Frank Renou was deceased in 2016 and yet remained a Plaintiff

41. Court File No.:CV-18-594948. Prayer for relief sought is for the Court to Order Ms Atas to undergo a psychiatric examination under the Mental Health Act for involuntary commitment and for the Court to refer to the Attorney General for criminal charges under the Criminal Code. against Ms Atas

42. Court File No.: CV-18-608448. An amalgamation of the previous three (3) defamation actions

FACTUAL ALLEGATIONS

43. The Parties to the four (4) defamation actions in Toronto, Ontario, Canada against Ms Atas in Toronto , Ontario , Canada entered into a corrupt agreement with each other in 2019 to file false affidavits with the Court in Toronto for the purpose of getting a Judgment from Justice D.L. Corbett of the Superior Court of Ontario. The Judgment of Justice Corbett dated January 28, 2021, the Judgment in defamation from a foreign jurisdiction , is linked as a PDF file at <https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf>
44. The Parties to the four (4) defamation actions in Toronto, Ontario, Canada had entered into a corrupt agreement with the Defendant Kashmir Hill to write a story about the Ms Atas to be published in the New York Times to smear Ms Atas with a false narrative to the entire world
45. The Parties to the four (4) defamation actions in Toronto, Ontario, Canada had entered into a corrupt agreement with the Defendant Kashmir Hill to ascertain that Ms Atas has electronic devices in her possession with internet access which they expected contained internet posts about the four (4) defamation actions in Toronto, Ontario, Canada
46. The Parties to the four (4) defamation actions in Toronto, Ontario, Canada wanted the electronic devices in Ms Atas' possession so they could gather evidence from the hard drive to be used as evidence in their still pending contempt motions in the same actions

and on the same set of facts and evidence pending in Toronto, Ontario, Canada where they were seeking order for incarceration of Ms Atas

47. The Parties to the four (4) defamation actions in Toronto, Ontario, Canada had entered into a corrupt agreement with the Defendant Kashmir Hill to coordinate the New York Times story with their complaint filed with the Toronto Police Services contemporarily

48. On October 26 2020 Kashmir Hill emailed Ms Atas on October 26, 2020 and during their conversation that day, Kashmir Hill was fixated on Ms Atas electronic devices , even deriding her with comments “ I’m told that you don't have a phone or computer and you use internet cafes and libraries “

49. The conversation on October 26, 2020 was recorded on Kashmir Hills instance and Ms Atas’ consent , with a threat that if Ms Atas did not consent then Kashmir Hill would write her story on her memory.

50. The Parties to the four (4) defamation actions and the Defendant Kashmir Hill had visions of a documentary and netflix deal for the tabloid type story “ A Vast Web of Vengeance “ published in the prestigious and third largest selling newspaper in the USA

51. On February 9, 2021, Ms Atas was arrested in Toronto by the Toronto Police Services in a secret no knock entry

52. On February 9, 2021, Ms Atas’ electronic devices were seized by the Toronto Police Services

53. On February 9, 2021, Ms Atas was charged under the Section 300 Section 372 (1) , Section 264 (2) (b) of the Criminal Code of Canada for offenses between the 1st day of

January in the year 2000 and the 9th day of February in the year 2021 at the City of Toronto in the Toronto Region for offenses against the following complainants

- a. Dr. Joseph Caplan ,
- b. Michael Borysenko,
- c. Matthew Cameron
- d. Gary Caplan
- e. Matt Hefler
- f. Christina Wallis
- g. Natalie Wallis
- h. Luc Groleau
- i. Guy Babcock
- j. Jonathan Stancer
- k. Brad Bartja

54. On April 7, 2021, Ms Atas was charged under the Section 300 Section 372 (1) , Section 264 (2) (b) of the Criminal Code of Canada for offenses between the 1st day of January in the year 2000 and the 7th day of April in the year 2021 at the City of Toronto in the Toronto Region for offenses against the following complainants

- a. Lily Meier (daughter of the Defendant Ellen Pollock, editor of the New York Times)
- b. John Babcock

c. Samantha Stancer

d. Alana Stancer

55. On April 23, 2021, a New York Times reporter attended Ms Atas' bail hearing and the following day emailed the Attorney General of Ontario with the following

<https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.htm>

56. In September 2021, the Toronto Police Services obtained a search warrant to search Ms Atas' electronic devices

57. The Toronto Police Services found no evidence of internet posts on Ms Atas' electronic devices

58. On December 7, 2021, the Attorney General of Ontario withdrew all the Criminal Code charges against Ms Atas

59. Ms Atas does not have a Criminal Record

Vexatious Litigant Judgment

60. During Ms Atas' conversations with the Defendant Kashmir Hill , Kashmir Hill raised the vexatious litigant Order of Justice D.L.Corbett.

61. On October 27, 2020 at 5:04 PM, Ms Atas emailed to the defendant Kashmir Hill a copy of Justice Corbett's Formal Judgment(vexatious litigant Judgment) and costs Judgment of two hundred and forty thousand (\$240,000) for his vexatious litigant Judgment

62. Justice Corbett had drafted a Formal Judgment for his vexatious litigant Judgment and added terms and provisions in the Formal Judgment in in Paragraphs 2-6 and 35 that were not and are not in his reasons for Judgment publicly reporting on Canlii at

<https://www.canlii.org/en/on/onsc/doc/2018/2018onsc58/2018onsc58.html?resultIndex=1>

63. The added terms and provisions in Justice Corbett's Formal Judgment in Paragraphs 2-6 and 35 place Justice Corbett as the case management Judge where he is Judge, Jury, Executioner and Appellate Judge of all of his own orders in actions involving Ms Atas including proceedings launched against her and where she is the defendant, The added terms and provisions insulate all of Justice Corbett's Orders from from Appellate Review and insulate him from the required statutory oversight by the Attorney General in "vexatious litigant orders"
64. Justice Corbett has created a Kangaroo Court in Toronto, Ontario, Canada cloaked with secrecy and no oversight
65. On October 19, 2018, Justice Corbett also made an unprecedented costs Judgment of two hundred and forty thousand (\$240,000) in the "vexatious litigant Judgment " with the costs order to be paid by Ms Atas prior to Ms Atas taking any steps in any litigation, this being an insurmountable barrier in what is already a Kangaroo Court
66. Outrageously, Justice Corbett's Formal Judgment in Paragraph 8 reads as follows and applies to any Court outside of Ontario and that would include the Southern District of New York:
8. THIS COURT ORDERS that neither of the Respondents shall commence or continue (a) Court proceedings in the Federal Court of Canada or in any court outside Ontario; (b) administrative proceedings of any kind (including, without limitation, complaints to any professional or regulatory body or claims to a human rights commission or tribunal) unless the Respondents simultaneously provide a copy of the Reasons for Judgment and this Judgment to the court, , body, , commission or tribunal to which the claim or complaint is made.

January 28, 2021 Judgment of the Justice Corbett

67. The Judgment from Justice D.L. Corbett of the Superior Court of Ontario, which were heard November and December 2019 and released January 28, 2021 and is linked as a PDF on the NYT.COM at the following URL
<https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf>
68. Justice Corbett's Judgment dated January 28, 2021 vests title of the internet posts in the Plaintiffs to the four (4) defamation actions in Toronto, Ontario, Canada
69. Justice Corbett's Judgment dated January 28, 2021 makes a finding of falsity of statement because the Plaintiffs to the four (4) defamation actions in Toronto, Ontario, Canada asked for it although Justice Corbett admits this could pose a serious problem in many defamation cases in Canadian Jurisprudence
70. Justice Corbett's Judgment dated January 28, 2021 recognizes the tort of harassment in Ontario and claims to base this on an American tort cited in an obscure and dated legal publication, it doesn't appear in American case law. It doesn't even appear that these types of claims have only successfully been used no more than four times in all of the U.S.
71. Justice Corbett's Judgment dated January 28, 2021 recognizes "protected parties" these being a list of people who are not Plaintiffs to the actions and have never been before the Court, including some deceased people but have "protection and benefit" of Justice Corbett's Judgment

72. Following the release of Justice Corbett's Judgment dated January 28 2021 published as a link at <https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf> the Parties in the four (4) defamation actions in Toronto, Ontario, Canada against Ms Atas commenced two proceedings before Justice Corbett on February 8, 2021
73. The first was to surreptitiously attach a document consisting of 2514 pages of internet posts titled " Schedule B List of Internet Posts Attributed to Nadire Atas dated February 8, 2021 " with the URLs dated prior to November 13, 2019 and subsequent to November 13, 2019 continuing all the way to January 28, 2021 to form Justice Corbett's Judgment dated January 28 2021.
74. The document consisting of 2514 pages included internet posts about Matthew Hefler, Jennifer Hefler and Matthew Cameron who were not Plaintiffs to the four (4) defamation actions, were not on the list if so called " protected parties " and had never been before the Court on these matters
75. The Parties in the four (4) defamation actions in Toronto , Ontario, Canada were required to bring a motion to insert the document consisting of 2514 pages of internet posts titled " Schedule B List of Internet Posts Attributed to Nadire Atas " to the January 28, 2018 Judgment.
76. On August 5, 2021, Justice Corbett released an Order making no finding of authorship of the 2514 pages of internet posts
77. The second matter on February 8, 2021 was an ex-parte motion for Contempt and Anton Piller Like Order to obtain Ms Atas' electronic devices " to verify and show that the Defendant is the author, publisher and facilitator of Offending and Harassing Posts from and after the date of the Judgment of this Court."

78. The Parties in the four (4) defamation actions in Toronto, Ontario, Canada abandoned their ex-parte motion for Contempt and Anton Piller Like Order to obtain Ms Atas' electronic devices as the Toronto Police had arrested Ms Atas on February 9, 2021 and her ' electronic devices were seized and in the custody of the Toronto Police Services as evidence in a Criminal Prosecution
79. The Parties in the four (4) defamation actions in Toronto , Ontario, Canada then sought to expand Justice Corbett's Judgment dated January 28, 2021 to include not only "Credentials" but also "Content" to then obtain an order for a copy of the hard drive of the seized electronics in the custody the Toronto Police Services . Below is the email of Gary Caplan, Criminal Complainant in the February 9, 2021 criminal charges, a source in the New York Times story " A Vast Web of Vengeance " and the lawyer for four (4) defamation actions

From: Gary Caplan <GCaplan@mcr.law>

Sent: February 16, 2021 11:58 AM

To: Lyon-McIndoo, Patricia (JUD) <Patricia.Lyon-McIndoo@ontario.ca>

Cc: Christina Wallis <cwallis@wallis-law.com> Annessa Cenerini <ACenerini@mcr.law>

Subject:

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Dear Patricia

Would you kindly provide Justice Corbett with the following communication.

Your Honor,

I attach to this email the affidavit of Luc Groleau with respect to the identification of "Offending Posts" from November 2019 (when the motions were argued before you) to January 28, 2021 (the date of the release of your Reasons/Judgment) and from January 28 2021 to date.

I also attach a copy of another version of the proposed Judgment. Please note the following changes:

- a) The affidavit of Mr. Groleau is referred to in the Preamble to the Judgment;*
- b) The Judgment language is expanded to include not only "Credentials" but also "Content"*
- c) The Judgment includes an "alternative" order banning Ms. Atas from the internet. In the course of the case conference you suggested that you would "consider" this kind of provision;*
- d) The Judgment references the fact that MS. Atas' computer and phone are in the custody of the TPS and I am advised that the Crown intends to seek a search warrant of its contents. The Judgment language has been expanded to grant the Parties and the Protected Persons an ownership interest in the metadata contained on the hard drives to the extent it relates to the Parties and Protected Persons.*

We are not aware of Ms. Atas' whereabouts but suspect that she is back at the Delta Hotel under an alias.

We propose to courier to her a copy of this email, and the attachments. We can also advise her, subject to your direction, as to how she is to attend a teleconference or a personal attendance to finalize the Judgment.

If we are granted a property interest in the Credentials and the Content we will proceed to obtain an order for a copy of the hard drive.

Thank you.

Gary M. Caplan C.S (Civ. Lit.) LL.M, [C.Med.](#), [C.Arb](#)

Partner

80. On August 19, 2021, the Parties to the four defamation actions commenced a motion for Post Judgment Anton Piller Like Order to obtain a hard drive of Ms Atas' electronic devices "to allow the plaintiffs to take possession of their "property" or "metadata" as defined in the said Judgment and Order so as to allow them to execute upon the Judgment and Ancillary Orders of the Honorable Mr. Justice Corbett dated January 28, 2021."

81. In Luc Groleau's affidavit, he swears under oath the following:

The data found on Ms Atas' computer could be used to further determine authorship of defamatory posts and assist in the removal of posts from originating websites and search engines.

82. In the motions before Justice D.L. Corbett in November and December 2021, over 30,000 pages of documents were filed.

83. Despite Justice D.L. Corbett's Judgment dated January 28, 2021, the parties still pursued Ms Atas' electronic devices for evidence of internet posts .

84. Justice D.L. Corbett's Judgment dated January 28, 2021 was limited to the evidence before him in November 2019

DR. TODD ESSIG

85. Dr Todd Essig made statements published in the story "A VAST WEB OF

VENGEANCE “ that Ms Atas is mentally ill despite never having examined her

86. Dr Todd Essig published on his twitter account publicly laudeding Ms Atas’ arrest

“ A Vast Web of Vengeance “

87. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

In June 2020, Matthew Hefler, 32, the brother-in-law of a colleague of Ms. Wallis, became one of the latest targets. Mr. Hefler, who lives in Nova Scotia, is a historian who recently completed his Ph.D. in war studies. He is trying to find a teaching job. But anyone who searches for him online will encounter posts and images tarring him as a pedophile and “pervert freak.”

Until recently, Mr. Hefler had never heard of Ms. Atas. He had no clue why she was attacking him. “You discover that someone you’ve never met, across the country, is running a one-man troll farm against you,” Mr. Hefler said. “It’s a nightmare scenario.”

88. Matthew Hefler is not a Plaintiff or so called “protected party” to the defamation actions in <https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf>

89. Matthew Hefler’s name has never been before the Court in the four (4) defamation action in Toronto , Ontario, Canada.

90. The Parties to the four (4) defamation actions added Matthew Hefler’s name and internet posts about him from 2020 to the document consisting of 2514 pages of internet posts

titled “ Schedule B List of Internet Posts Attributed to Nadire Atas dated February 8, 2021 “ to form Justice Corbett’s Judgment dated January 28 2021.

91. On August 5, 2021, Justice Corbett released an Order making no finding of authorship of the 2514 pages of internet posts

92. The Defendants The New York Times published without privilege the false and defamatory statements about Ms Atas on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas is the author of internet posts about Matthew Hefler.

93. The Defendant The New York Times published the false and defamatory statement without privilege to its 54 Million followers and 192 Million Twitter users on its Twitter Account at 2:57 PM on January 30, 2021 on the URL <https://twitter.com/nytimes/status/1355606062779551744> the following:

“You discover that someone you’ve never met, across the country, is running a one-man troll farm against you. It’s a nightmare scenario.”

MATTHEW HEFLER. HISTORIAN WHO WAS TARGETED ONLINE BY NADIRE ATAS

94. Defendant The New York Times also published on its Twitter a link to “ A Vast Web of Vengeance” on the New York Times website at nyti.ms/2MCKjpe



95. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at [nytimes.com](https://www.nytimes.com) on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:
96. Ms. Atas allegedly resorted to revenge. In 2009, Matt Cameron, a junior lawyer working with Ms. Wallis on the Atas case, started getting calls and emails at the office from men interested in meeting for sex. Someone impersonating him had responded by email to raunchy Craigslist ads and given his contact information. (Metadata from those emails, filed in court, pointed to Ms. Atas’s involvement.)

97. Ms Atas emailed on January 27, 2021 at 7:51 AM to the defendants Kashmir Hill and Ellen Pollock a copy of the transcript of the hearing of the s. 140 application under the Courts of Justice Act heard on September 11, 2015 where Justice D. L. Corbett rejected the so called Metadata
98. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas is the author of Craigslist ads impersonating Matthew Cameron and Copied below page 81 and 82 of the Transcript of the s. 140 application under the Courts of Justice Act heard on September 11, 2015

MS. WALLIS: The craigslist.com I'll call it, and I can refer you to the tabs in a moment. But what happened here is this is one of the most egregious examples of Ms. Atas's vexatious conduct. She fraudulently used a Dale & Lessmann's email of one of our lawyers at the time, Matt Cameron. She copied and pasted his email signature.

THE COURT: This is Pat Cameron?

MS. WALLIS: Matt, Matthew.

THE COURT: Matthew Cameron?

MS. WALLIS: Yes. He's no longer with our firm but he was at the time, and he was dealing with these files. She pasted his email address and placed an advertisement on craigslist.com soliciting gay sex. I have proof of this.

THE COURT: And the proof is filed.

MS. WALLIS: Yes it is, and I'm going to direct you to it. Exhibit – I'm sorry. It's Tab 215 of the multi-volume affidavit of Chris Perri. Some of these emails that Mr. Matthew – or Mr. Cameron received as a result of this advertisement are set out from page 1964 and on, and you can see that they're crude and they're obscene. My firm looked into the metadata behind these emails, and it's, it's set out at page 1962. And page 1963 we've circled a part in that metadata that has Ms. Atas's email address. This links her as being....

THE COURT: Well how do I know that?

MS. WALLIS: Well this is....

THE COURT: I'm not capable of interpreting the metadata.

MS. WALLIS: No, but why would her email address be in there?

THE COURT: Well I don't know the answer to that, but would I not need expert evidence to assist me with what this means?

MS. WALLIS: If Matt Cameron is getting an email as a result of an advertisement on Craigslist, what does Ms. Atas have to do with them?

THE COURT: I have no idea, but I have no idea what this means here or how it came to be there.

MS. WALLIS: Okay, but..

THE COURT: I mean if...

MS. WALLIS: ...but....

THE COURT: ...you're asking me to make a finding that Ms. Atas did this, I need more than that, and I'm not capable of interpreting that document and what it means. For all I know, and I say this tongue in cheek, ma'am, but for all I know Mr. Cameron inserted that to cover his tracks, and I'm not suggesting that because that, that – I have no idea whether that would be possible. But you can't put the evidence in and this is not something of which I can take judicial notice.

99. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

100. Mr. Babcock felt lightheaded. A memory came back to him: When his mother died in 1999, the family had received vulgar, anonymous letters celebrating her death. A neighbor received a typed letter stating that Mr. Babcock's father “has been seen roaming the neighborhood late at night and masturbating behind the bushes.” The Babcocks had suspected Ms. Atas, who was the only person who had ever threatened them. (Ms. Atas denied making threats or writing the letters.)
101. The Defendant Kashmir Hill appeared on the CBC Radio The Current on February 17, 2021 and published that the Babcocks were never able to prove that Ms Atas is the

author of any letters sent in their neighborhood. Below are the words of the Defendant Kashmir Hill on he CBC Radio The Current on February 17, 2021 at the URL

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652>

KASHMIR HILL: It's hard to say exactly when it started. She she actually had kind of done these attacks on people pre-Internet. There was a family that had employed her. And after she lost her job there, it appears that she sent them anonymous letters in the mail after the mother in the family died, saying horrible things about her. And she sent, it seems, letters to their neighbours saying that the father in the family had been seen roaming the neighbourhood at night and masturbating. And they had thought at the time that it was Nadire Atas, but they were never able to prove it.

102. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL

<https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

A relative of Ms. Atas told me that family members had repeatedly tried and failed to get her help for mental health problems.

103. Kashmir Hill has fabricated this and has not spoken with any unnamed family members of Ms Atas that have said “ that family members had repeatedly tried and failed to get her help for mental health problems”

104. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL

<https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the

entire world that Ms Atas' unnamed family members had repeatedly tried and failed to get her help for mental health problems.

105. The Defendants published without privilege in "A Vast Web of Vengeance" on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

106. Mr. Babcock discovered Nadire Atas's involvement when he found an old photo of her accompanying a slanderous comment on a blog post.

107. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas is the author of a slanderous comment on a blog post.

108. This is the blog at <https://chrisblattman.com/>. Ms Atas' image is not on this blog



Video Songs

October 15, 2016

very nice post. check all video songs of the world

Gloria Moreno

October 29, 2016

hey, interesting information i got from here...would love to visit here again..http://getsoftlink.com

chris pollard

October 30, 2016

Scammer / Guy Sanderson Babcock / QUARTERMAIN & COMPANY LTD / GUY BABCOCK / Former Janitor at Oxford masquerading as an IT consultant / Thief / Steals Data and Money / 20-22 WENLOCK ROAD, ISLINGTON, LONDON, ENGLAND, N1 7GU is a mail box and not an office address. Beware of this SCAMMER operating as QUARTERMAIN & COMPANY LTD. Guy Babcock was born October 1961 to give the public an idea of his age if you ever meet this idiot.

Rip Off / Quartermain & Company Ltd / The owner Guy Babcock is a rip off artist. Consulted with Guy Sanderson Babcock for software development. He demanded and received \$150,000.00 US up front with a completion date of 60 days. This rip off artist has not delivered the program and has been avoiding all emails . He is hiding out in Oxford UK. The address of 20-22 Wenlock Road , London N1 7GU for Quartermain & Company Ltd is a rented mailbox. Anyone in the IT world should avoid this idiot and his sham company Quartermain & Company Ltd.

مخلص بنو

November 12, 2016

thanks

109. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

A relative of one lawyer said she spent months applying for jobs in 2019 without getting any offers. The woman, who asked not to be named because she feared Ms. Atas, said her bills piled up.
110. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that an unnamed source fears Ms Atas .

111. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

Ms. Atas claims that she didn’t write those posts and that her enemies fabricated the case against her. But the evidence suggests otherwise. For example, most of the attacks were posted anonymously, but like Mr. Babcock, I discovered a “paedophile” accusation against him on an old WordPress blog where she was listed as the author. When I asked her about it, Ms. Atas denied writing it. A few days later, the years-old comment had been deleted.

112. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas is the author of an old unnamed WordPress blog and that she had the means to delete it .

113. Kashmir Hill wrote that Ms Atas had deleted a years old comment as a dog whistle to the Toronto Police Services that Ms Atas is in possession of electronic devices to access the internet and that her electronic devices have information that allows her to delete a years old comment.

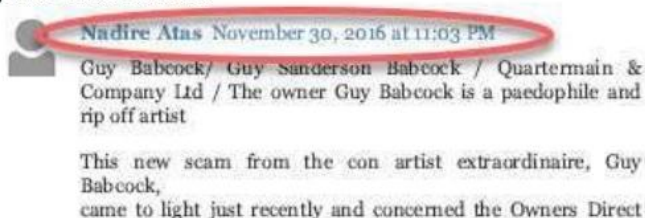
114. The parties to the four (4) defamation actions had also falsely written a similar statement in their complaint to the Toronto Police Services on January 6, 2021 that Ms

Atas is in possession of electronic devices to access the internet and that her electronic devices have information that allows her to change a years old comment.

115. The parties to the four (4) defamation actions and Kashmir Hill coordinated the complaint to the Toronto Police Services filed on January 6, 2021 referencing that Ms Atas had been interviewed by a reporter for the New York Times and the story “A Vast Web of Vengeance” was published three (3) weeks later on January 30, 2021.

This new scam from the con artist extraordinaire, Guy Babcock, came to light just recently and concerned the Owners Direct

The following image, from the same site was captured on April 27, 2020. The profile name “Unknown” was changed to “Nadire Atas”:



NOTE: When this website was first identified, Atas' name was not present

Shortly after Nadire Atas was interviewed by a reporter from The New York Times about an article on internet defamation and harassment, the post was changed back to “Unknown”:

116. The Defendants published without privilege in “A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

But her life was beginning to fall apart.

117. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas' life was beginning to fall apart and this lead to her mental illness to cause her to post tens of thousands of internet postings about hundreds of people . Ms Atas' life was not falling apart .
118. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:
119. But around 2001, according to Ontario court filings, she was arrested and charged with assault and resisting arrest. The charges were ultimately withdrawn, but a peace bond, Canada's equivalent of a restraining order, was issued against her.
120. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas was charged with assault and a peace bond was issued against her and that a peace bond is Canada's equivalent of a restraining order .
121. The Defendants published without privilege in “ A Vast Web of Vengeance “ on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

Ms. Atas moved into one of the apartments in her Toronto building, which was the subject of complaints from tenants. One, who moved in during 2008, found their new apartment filthy. When they opened the refrigerator, the tenant said in an interview, a “waterfall of maggots” poured out.

Ms. Atas made the building’s residents feel unsafe. “She has harassed us repeatedly, forcing us to finally call the police on her,” according to an email from a tenant that was filed in court. Ms. Atas was charged with assaulting another tenant. She said in a court filing that at the time she “was suffering from severe mental illness that manifested itself in erratic behaviour that resulted in criminal charges.” The charges were ultimately dropped.

122. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas is mentally ill and makes people feel unsafe from a decade ago.

123. A main floor tenant Stephanie Ailello was encouraged by Matthew Cameron , the lawyer assigned to the Power of Sale of St. George St to file reports with the Toronto Police Services in 2009 inorder to use the complaints to evict Ms Atas from St. George St

124. Main floor tenant Stephanie Ailello filed complaint with Toronto Police Services in February 2009 and Ms Atas as charged and the charges were withdrawn

125. Main floor tenant Stephanie Ailello filed complaint with Toronto Police Services in May 15, 2009 alleging a break in. Ms Atas was NOT contacted by the Toronto Police

Services on this complaint and the report was closed on the same day and concluded as no criminal activity.

126. Ms Atas found out about Stephanie Aiello's further complaints she had made in May 15, 2009 in affidavits by Christina Wallis sworn April 20, 2018 and April 26, 2018 , almost a decade later.

127. The Defendants published without privilege in " A Vast Web of Vengeance " on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> the following:

During an interview with Ms. Atas in November, she grew angry that I planned to write this article. A week later, someone started writing posts about me and my husband on Cheaterbot, BadGirlReports and some of the other sites where Mr. Babcock and others had been targeted. The posts claimed that my husband was a drug addict and that I was a plagiarist who slept with my boss in order to get promoted. Ms. Atas said it wasn't her.

Within a week, there were more than 100 posts about me.

After Ms. Atas talked to my editor, posts appeared about her. Ms. Atas said she hadn't created those, either.

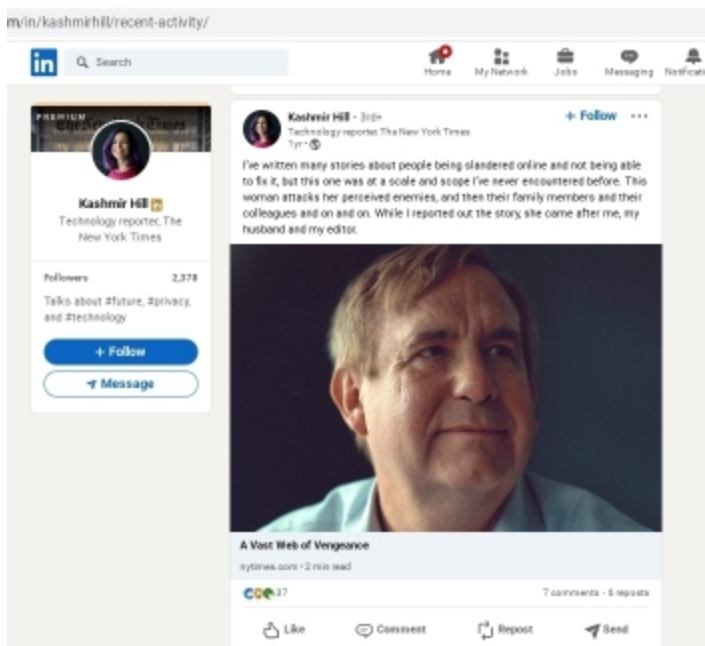
128. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on January 30, 2021 at the URL <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> to the entire world that Ms Atas has published internet posts about the defendants Kashmir Hill and her husband and defendant Ellen Pollock

129. On February 9, 2021, The Toronto Police Services seized Ms Atas electronic devices upon her arrest

130. Ms Atas was arrested and charged on April 7, 2021 by the Toronto Police Services under the Criminal Code of Canada with publishing internet posts about defendant Lily Meier , daughter of defendant Ellen Pollock .
131. The Toronto Police Services obtained a search warrant and searched Ms Atas electronic devices and found no evidence of internet posts
132. The Criminal charges were withdrawn by the Attorney General of Ontario on December 7, 2021
133. Defendant Kashmir Hill published the same false and defamatory statement without privilege to her 3 Thousand followers and 875 Million Linkedin users on her Linkedin Page at <https://www.linkedin.com/in/kashmirhill/recent-activity/> on January 31, 2021 on the following :

I've written many stories about people being slandered online and not being able to fix it, but this one was at a scale and scope I've never encountered before. This woman attacks her perceived enemies, and then their family members and their colleagues and on and on. While I reported out the story, she came after me, my husband and my editor.

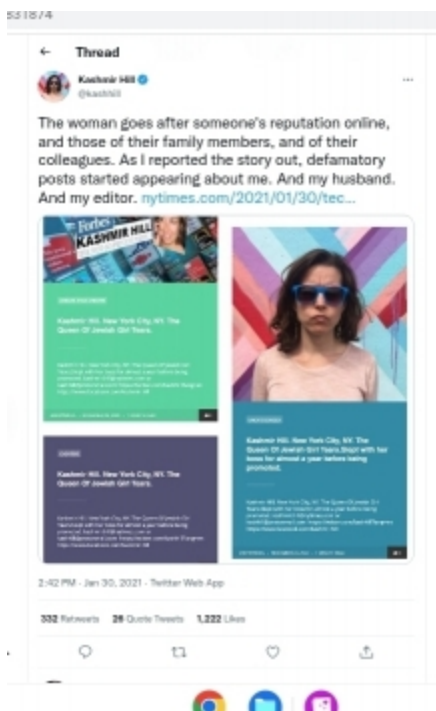
Defendant Kashmir Hill also published on her Linkedin account a link to “ A Vast Web of Vengeance” on the New York Times website at <https://nytimes.com/2021/01/30/tec>



134. Defendant Kashmir Hill again published false and defamatory statement without privilege to her 267 Thousand followers and 192 Million Twitter users on her Kashmir Hill Twitter Account at 2:42 PM on January 30, 2021 on <https://twitter.com/kashhill/status/1355602407082831874> the following :

The woman goes after someone's reputation online, and those of their family members, and of their colleagues. As I reported the story out, defamatory posts started appearing about me. And my husband. And my editor.

Defendant Kashmir Hill also published on her Twitter Account a link to “A Vast Web of Vengeance” on the New York Times website at <https://nytimes.com/2021/01/30/tec> on her Twitter Account .



Woman Accused of Defaming Dozens Online Is Arrested

135. The Defendants published without privilege in “ Woman Accused of Defaming Dozens Online Is Arrested “ on the New York Times website at nytimes.com on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> the following:

The arrest and charges followed a New York Times article published on Jan. 30 that detailed her campaign of harassment and defamation, illustrating the destruction that one person can wreak thanks to the hands-off postures of big tech companies like Google.

136. This is a false and defamatory statement published by the New York Times on the New York Times website at [nytimes.com](https://www.nytimes.com) on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> to the entire world that Ms Atas has published internet posts about the defendants Kashmir Hill and her husband and defendant Ellen Pollock
137. The Defendants published without privilege in “A Vast Web of Vengeance” on the New York Times website at [nytimes.com](https://www.nytimes.com) on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> the following:
138. Last month, a Toronto judge ordered Ms. Atas to stop her online attacks against 45 people who had sued her for defamation. But posts continued to appear about the plaintiffs and their families on sites such as BadGirlReports and Cheaters.News.
139. This is a false and defamatory statement published by the New York Times on the New York Times website at [nytimes.com](https://www.nytimes.com) on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> to the entire world that Ms Atas has published internet posts about the defendants on BadGirlReports and Cheaters.News
140. The Defendants published without privilege in “Woman Accused of Defaming Dozens Online Is Arrested” on the New York Times website at [nytimes.com](https://www.nytimes.com) on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> the following:
141. Ms. Atas, who has told The Times that she had suffered from mental health problems in the past, did not respond to requests for comment about her arrest.

142. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> to the entire world that Ms Atas' occasional mild depression has caused her to post on the internet for decades

143. The Defendants published without privilege in " Woman Accused of Defaming Dozens Online Is Arrested " on the New York Times website at nytimes.com on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> the following:

The targets of Ms. Atas's attacks — including Guy Babcock, whose family employed her at its Canadian real estate office — tried for years to get law enforcement to take criminal action against her, filing police reports in the United States, Britain and Canada, where her victims lived. The criminal charges filed this week are the first Ms. Atas has faced regarding her online posts.

144. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> to the entire world that Ms Atas is the publisher of internet posts

145. The Defendants published without privilege in " Woman Accused of Defaming Dozens Online Is Arrested " on the New York Times website at nytimes.com on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> the following:

The day after The Times published its article, which quoted Ms. Wallis extensively, a site called GossipBlaze.com emailed her, saying it believed that Ms. Atas had “been spamming our submission form with tens if not hundreds of posts.”

“Almost all of them are from the same IP and we figured it might be helpful to pass you this info,” the email said, referring to an internet protocol address, a unique identifier used by a computer or a computer network.

Ms. Wallis shared the email and IP address with a group of victims who had previously contacted the police. One of them, Luc Groleau, determined that the IP address most likely originated from a computer at a hotel in eastern Toronto. Mr. Groleau shared the information with a lawyer, who said he had alerted the police to Ms. Atas’s whereabouts.

146. This is a false and defamatory statement published by the New York Times on the New York Times website at [nytimes.com](https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html) on February 10, 2021 at the URL <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html> to the entire world that Ms Atas was spamming from an IP address. There was nothing from the Toronto Police Services of any such conduct, This has been fabricated by Christina Wallis,

February 17, 2021 the Galloway

147. The Defendant Kashmir Hill published false and defamatory statements without privilege to the entire world on the The Current with Matt Galloway on February 17 2021 at <https://www.cbc.ca/player/play/1862686275577> the following

And then, years later, she basically took these same types of attacks online. And she would write that people, they were frauds, that they were scammers, that they were thieves. And it kind of kept getting worse and worse, calling them sexual deviants and pedophiles. And she was writing about lawyers that she was engaging litigation with, this family that employed her 30 years ago, and just writing so much about them, hundreds of posts, thousands of posts till it really just took over their Google footprints.

MATT GALLOWAY: Where was she making these posts? What websites were they appearing on?

KASHMIR HILL: In some cases, she made her own websites, like WordPress blogs. But oftentimes, she was using these sites that exist kind of for this purpose. People have different names for them, complaint sites, gripe sites, cheater sites. There's this whole constellation of sites that just exist for people to write bad things, negative reports about other people. And the idea is, you know, if you date somebody who cheats on you, you can write about it on one of these sites. And then some future person who encounters that person will know they have this bad history. The problem is these sites are not fact-checked. There's no one making sure that what's written on these sites is true.

148. This is a false and defamatory statement published by the CBC Radio The Current on February 17, 2021 at the URL

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652> to the entire world that Ms Atas is the author of internet posts

149. The Defendant Kashmir Hill published false and defamatory statements without privilege to the entire world on the The Current with Matt Galloway on February 17 2021 at <https://www.cbc.ca/player/play/1862686275577> the following

KASHMIR HILL: That's what was so troubling and striking about this story. It wasn't just the direct people that she was interacting with. There would be posts about their

sisters, their brothers, their aunts, people they worked with. It was truly this kind of contagion, and it would just spread from one person to anybody she could find connected to them on... on social media or online

This is a false and defamatory statement published by the CBC Radio The Current on February 17, 2021 at the URL

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652> to the entire world that Ms Atas is the author of unnamed people who were never before the court

150. The Defendant Kashmir Hill published false and defamatory statements without privilege to the entire world on the The Current with Matt Galloway on February 17 2021 at <https://www.cbc.ca/player/play/1862686275577>

MATT GALLOWAY: Luc Groleau and Christina Wallis are victims of online harassment.

Kashmir Hill has been listening in to this. Nadire Atas is now facing criminal charges. What is she charged with?

KASHMIR HILL: She is charged with criminal harassment and libel. It's about these posts that she has been writing for years.

MATT GALLOWAY: In the context of what we've been hearing about and what you've been describing, what's the significance of those charges? In particular?

KASHMIR HILL: This was a situation where you had these people who had just been really suffering for years, not being able to do anything, they had reported this to police over the years, and no one had helped them, they were trying to solve it in the civil courts. This was a very powerful moment for them that finally, someone in law enforcement is doing something about it. But it really is a difficult case. You know, like at the end of the day, this is a woman who's writing horrible things online. Is the solution to that jail time? And, you know, she does have mental health issues she's told the court. I talked to a

relative who said she has mental illness and they've tried for years to help her. It's a difficult problem on... on many different levels. And society kind of hasn't had a good way to deal with it.

151. This is a false and defamatory statement published by the CBC Radio The Current on February 17, 2021 at the URL

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652> to the entire world that Ms Atas has mental health problems that has caused her to post on the internet for decades and that her unnamed family member has been trying for years to get her help.

152. The Defendant Kashmir Hill published false and defamatory statements without privilege to the entire world on the The Current with Matt Galloway on February 17 2021 at <https://www.cbc.ca/player/play/1862686275577> the following

KASHMIR HILL: You know, I was somewhat prepared for this, but after I spoke to Nadire Atas several times on the phone, and she tried to dissuade me from doing the story, she said she wasn't responsible. She encouraged me to write about another case where something like this had happened. And once I made it clear to her that I was going to tell this story and that she was going to be in it, she got very angry at me. And a week after the last time I talked to her in November, these posts started appearing about me, saying that I was a plagiarist. I had slept with my boss for a year to get promoted. There were posts about my husband calling him a sex addict and a drug addict. I mean, I have a lot about me online. I have very strong Google results from all of the, you know, news stories I've written over the years. But these results actually started appearing on the first page of my results. And I was shocked. Like, I just didn't think that they'd be able to break through. Over time, they disappeared. And then Nadire Atas asked to speak to my editor, and after she talked to my editor, posts appeared about her as well.

153. This is a false and defamatory statement published by the CBC Radio The Current on February 17, 2021 at the URL

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652> to the entire world that Ms Atasis the author of internet posts about Kashmir Hill

154. There were internet posts about Kashmir Hill and Aaron Krolik published on a site called the Shitreport dated November 7, 2020 and November 29, 2020. Ms Atas did not and could not have known Kashmir Hill and Aaron Krolik were writing partners in November 2020.

155. It was not until the New York Times story “The Scandal Industry” was published on April 24, 2021 that it was revealed in the story that Aaron Krolik had been an uncredited co- writer on “A Vast Web of Vengeance”.

156. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on April 6, 2021 at the URL for the podcast at <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html>



157. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on April 6, 2021 at the URL for the podcast at <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html>

But then over time, her behavior changed in her performance deteriorated. Her office got very messy. And so the Babcock's basically went in and there was just dirty laundry and like half eaten food. And then this really concerning incident happened where a homeowner's signature had been forged to keep the house on the market.

158. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on April 6, 2021 at the URL <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html> to the entire world that Ms Atas is a hoarder and engaged in fraud and and to perpetuate the false narrative that Ms Atas is mentally ill
159. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on April 6, 2021 at the URL for the podcast at <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html>

And what do you learn about Nadir Odyssey's life since then? So in twenty eighteen, the lawyers decide to hire a private investigator to try to figure out basically where she lived, like how she was accessing the Internet. They're hoping to get evidence in our case that she was responsible. And the private investigator discovered that she was spending nights in homeless shelters and spending hours at the library using public computers, and she would be there from noon to midnight. [00:23:03] So the body of evidence is becoming pretty overwhelming here, that this is Nadir Otus behind this.

160. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on April 6, 2021 at the URL <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html> to the entire world that Ms Atas is the author and that posts on the internet are from the library using public computers

161. Ms Atas was surveilled by a private investigator fired by the parties to the four (4) defamation actions to “ catch Ms Atas in the act “ of posting on the internet and therefore defying the injunction orders, the subject of the contempt motions , a quasi criminal procedure in a civil procedure , against Ms Atas where the parties to the four (4) defamation actions are seeking incarceration of Nadire Atas.

162. Email from Gary Caplan to the parties in the four (4) defamation actions Wednesday, November 14, 2018 7:34 AM that Ms Atas was surveilled by a private investigator Tom Warren and that she had not posted anything on the internet

Surveillance

Tom's team surveilled Atas on the day of our last court appearance. She went to the UofT library and did access the Pinterest and WordPress. We did NOT catch her in the act of offensive posting. So we

A1264

me

john: caplan lied emails from slansky

A1265

still do not have her in the act of defying the injunction orders. I have received an account from Tom which I will now pay. We may want to have her followed on the next occasion.

163. Below is the Affidavit of Tom Warren sworn June 20, 2019 that Ms Atas accessed the sites but did not post anything

95. At one point Atas left her terminal to get food and snacks from the cafeteria and left her belongings to save her spot. We were able to set up and note/watch/record the majority of her internet use. This started shortly after 12:05 p.m., and continued until approximately 10:55 p.m. -- just prior to the library closing. Atas was observed using the browser to navigate and use the following websites:

(b)(7)(F)(i), (b)(7)(F)(ii)

- 21 -

A284

A285

- a) Pinterest
- b) WordPress
- c) Gmail
- d) CNN
- e) YouTube

96. We did not observe Atas in the act of posting any offensive content. However, we did note that she appeared to be very knowledgeable and advanced in using these sites. We ceased surveillance when Atas left the library.

164. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on April 6, 2021 at the URL for the podcast at <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html>

[00:23:10] Right. And I became certain that she was after Post started appearing about me. You. Yes. On the same sites that all of her other victims have been written about. All of a sudden, there were posts with my photo saying I had slept with my boss for a year in order to get promoted, that I was a plagiarist. Other things I do not want to say on the daily. And then she started writing about my husband. Wow. [00:23:40] I thought I would be prepared. I had a feeling it was going to happen. It still felt horrible when it happened. What do you mean? I mean, I know it's not true, but you know what? If a source Googles me and then they see that about me and they might think, oh, it's on this ridiculous site, this probably isn't true. This is ridiculous. But I've interviewed people who know Luke and the Babcock's and ask them what they thought when they saw this [00:24:06] And they said, yeah, it looked ridiculous, but where there's smoke, there's fire. And so maybe there's something to it. And that's what's so horrible about having lies about you on the Internet, because people see it and they think maybe there's something to it. [00:24:20] So suddenly you're not that much different than Luke and Guy and becoming a target of this harassment. But in your case, you're a published New York Times journalist. Your online reputation and footprint is much bigger than theirs and can probably sustain these attacks better. Then they can and they are dealing with far more of these posts than you are to what ends up happening to them, to Guy and to Luke.

165. This is a false and defamatory statement published by the New York Times on the New York Times website at [nytimes.com](https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html) on April 6, 2021 at the URL <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html> to the entire world that Ms Atas is the author of internet posts about Kashmir Hill.

166. There were internet posts about Kashmir Hill and Aaron Krolik on a site called the Shitreport dated November 7, 2020 and November 29, 2020. Ms Atas could not have known Kashmir Hill and Aaron Krolik were writing partners in November 2020.

It was not until the New York Times story “ The Scandal Industry” was published on April 24, 2021 that it was revealed in the story that Aaron Krolik had been an uncredited co- writer on “ A Vast Web of Vengeance”. Ms Atas did not know and could not have known in November 2020 at the time the site Shitreport published slanderous and libelous statements about Kashmir Hill.

167. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on April 6, 2021 at the URL for the podcast at <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html>

So Luke and Guy had joined with all the lawyers in this big defamation lawsuit against Nadir OTUS. And at the beginning of this year, they won, which was a big deal because it meant that in the eyes of the law and the dear autistic was responsible and it should help them get the post taken down. And then around the same time, I published a big story in The New York Times about all this, about what happened to them, about Nadir OTUS. [00:25:20] And then shortly after that, the police arrested the dear artist and charged her with criminal harassment and criminal libel. [00:25:27] And so taken together, what will that mean for the ability of this family to kind of rid the Internet of these many false, defamatory claims about them

168. This is a false and defamatory statement published by the New York Times on the New York Times website at [nytimes.com](https://www.nytimes.com) on April 6, 2021 at the URL

<https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html> to the entire world that Ms Atas is the author ,

169. Even following the release Justice Corbett's Judgment dated January 28, 2021 at <https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf> , Luc Groleau swore multiple affidavits in multiple motions to the Toronto Courts to obtain Ms Atas' electronic devices or in the alternative , copies of the hard drives of Ms Atas' electronic devices to verify authorship of the internet posts.

170. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on April 6, 2021 at the URL for the podcast at <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html>

And these sites have fed on those problems. And there's other people like her. And these kinds of things are going to keep happening. So how are the Babcock's doing right now? I mean, they're their nemesis, their tormentor has been arrested. So how are they feeling about all this?

[00:26:41] I called Luke recently to see if it felt like it was finally over. You know, you'd been dealing with this for years. How did you feel when you found out that she had been arrested? It's hard to put in words a little bit of a mission accomplished type of feeling, but at the same time that you know that she'll be out of jail and that if history is proof of what's going to happen in the future. We know that she's going to resume her attacks and that she will probably intensify the attacks so it doesn't feel like it's over KAPONO very, very far from her. [00:27:39] I think we probably have many years ahead of us. [00:27:45]

171. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on April 6, 2021 at the URL <https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html> to the entire world that Ms Atas is the author , the nemesis and tormentor .
172. Luc Groleau, Guy Babcock and John Bbacock were all complainants in the Criminal Code Charges in Toronto, Ontario, Canada against Ms Atas on February 9, 2021 and April 7, 2021. All the Criminal Code Charges were withdrawn on December 7, 202
173. The Defendants Kashmir Hill and Michael Barbaro published false and defamatory statements without privilege to the entire world on the The Daily on May 3 , 2021 for the podcast at the URL <https://www.nytimes.com/2021/05/03/podcasts/the-daily/a-vast-web-of-vengeance-part-2.html>



Previously on the daily posts, my colleague Kashmir Hill told the story of a family whose reputation was ruined online. All this stress about worrying, about who is it, you know, and who could hate us so much by a woman with a vendetta that stretched back 30 years. It just all made sense to me. All of a sudden that

woman was eventually arrested, but the defamatory post she wrote live on today in part to Kashmir explores the dark world of websites, that profit from this kind of gossip and slander and why, despite all the damage they do, these sites can operate and thrive without consequences?

174. This is a false and defamatory statement published by the New York Times on the New York Times website at nytimes.com on May 3 , 2021 at the URL <https://www.nytimes.com/2021/05/03/podcasts/the-daily/a-vast-web-of-vengeance-part-2.html> to the entire world that Ms Atas is a woman with a vendetta that stretched back 30 years and that she is the author of internet posts of a family whose reputation was ruined online

In Lieu of Fun, Episode 395: Aaron Kroluk and Kashmir Hill and the Slander Industry on April 26, 2021 at the URL <https://www.youtube.com/watch?v=N0kRJYccifA>

175. The Defendants Kashmir Hill and Aaron Kroluk published false and defamatory statements without privilege to the entire world on the webcast In Lieu of Fun, Episode 395: Aaron Kroluk and Kashmir Hill and the Slander Industry on April 26, 2021 at the URL <https://www.youtube.com/watch?v=N0kRJYccifA> the following 👍

this is kind of the second in the series the first story that only i was bi-lined on

3:03

for various reasons um was about a man named guy babcock and

3:09

his family and over 100 other people who are all attacked online by this woman in

3:16

canada who hold serial grudges and would go online and call these

3:23

people pedophiles sexual deviants thieves scammers just destroyed the reputations of dozens

3:31

and dozens of people for various reasons um was involved she's a vexatious litigant in canada
involved in

3:38

a lot of lawsuits um had declared bankruptcy had lawyers come after her

3:44

had been fired from a job in 1991 decided to go after the family that fired her

3:50

and so i wrote a big story about her um and the way that she used these

3:57

various sites to destroy these people's reputations which had devastating impacts on their lives

176. This is a false and defamatory statement published by the the webcast In Lieu of Fun,
Episode 395: Aaron Kroluk and Kashmir Hill and the Slander Industry on April 26, 2021
at the URL <https://www.youtube.com/watch?v=N0kRJYccifA> to the entire world that
Ms Atas is the publisher

177. The Defendants Kashmir Hill and Aaron Kroluk published false and defamatory statements without privilege to the entire world on the webcast In Lieu of Fun, Episode 395: Aaron Kroluk and Kashmir Hill and the Slander Industry on April 26, 2021 at the URL <https://www.youtube.com/watch?v=N0kRJYccifA> the following 👍

the first story i did

53:31

about this canadian woman who wrote just lies about lots of people about them being pedophiles and sex offenders

53:38

and scammers um one of her targets he had been a lawyer that worked on this case against her back in 2008

53:45

she continued to write about him now he is at a public company he's their

53:50

general counsel he's an executive and he got pulled aside because it was coming up in due

53:57

diligence uh about the company and they were really concerned about it and um some of these things are kind of

54:04

i mean he explained the situation but it still looks bad um and it was really affecting me at

54:10

work and i just hear this all the time even if it's ridiculous sites i would talk to people who

54:16

had read this and i'd say i know it looks so stupid it didn't seem real but you know

54:22

where there's smoke there's fire i don't know if i want to let my kids play with his kids i mean it just makes

54:29

if it's saying that he's a pedophile and you think it's ridiculous but

54:34

there's still something in your head that's like well why would somebody write him write that about him if he's not true i it is

54:40

even actually done fights it takes a toll well yeah also just being lied about

54:48

takes a toll even if nobody sees it and nobody takes it seriously

178. This is a false and defamatory statement published by the the webcast In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry on April 26, 2021 at the URL <https://www.youtube.com/watch?v=N0kRJYccifA> to the entire world that Ms Atas is the publisher

The Slander Industry

179. The Defendants published without privilege in “ The Slander Industry “ on the New York Times website at nytimes.com on April 24, 2021 at the URL <https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.htm> I the following:

But do not underestimate their power. When someone attacks you on these so-called gripe sites, the results can be devastating. Earlier this year, we wrote about a woman in Toronto who poisoned the reputations of dozens of her perceived enemies by posting lies about them.

180. This is a false and defamatory statement published by the on the New York Times website at nytimes.com on April 24, 2021 at the URL <https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.htm> to the entire world that Ms Atas is the publisher of internet posts

FIRST CAUSE OF ACTION FOR PUBLICATION OF “ A VAST WEB OF VENGEANCE” ON THE NEW YORK TIMES WEBSITE ON JANUARY 30, 2021

(Defamation, Defamation Per Se, and Defamation by Implication)

(Against The New York Times Company d/b/a The New York Times, Ellen Pollock, Lily Meier , Kashmir Hill , Aaron Krolik , Dr Todd Essig, John Does 1 through 20, XYZ Corporations 1 through 10)

181. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.
182. The story was posted at the URL
<https://www.nytimes.com/2021/01/30/technology/change-my-google-results.htm>
I remains online at that location.
183. Defendants published or caused to be published false and defamatory statements in the “A Vast Web of Vengeance” , which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.
184. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.
185. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society
186. The defamatory statements in the “ A Vast Web of Vengeance “ are of and

concerning Ms. Atas , and reasonably understood to be about Ms Atas .

187. The defamatory statements in “ A Vast Web of Vengeance “ are false.
188. The Times published the defamatory statements in the “ A Vast Web of Vengeance “ knowing that they are false or with reckless disregard for the truth of the statements.
189. The defamatory statements in the “ A Vast Web of Vengeance “ constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity ; specifically that she was putting peoples safety at risk
190. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas , the defamatory statements in the “ A Vast Web of Vengeance “ have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
191. The re-publication of the defamatory statements in the “ A Vast Web of Vengeance “ in other publications, as well as via the dissemination of the “ A Vast Web of Vengeance “ through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
192. Defendants’ conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

SECOND CAUSE OF ACTION FOR PUBLICATION OF “Woman Accused Of Defaming Dozens Online Is Arrested” ON THE NEW YORK TIMES WEBSITE ON JANUARY 30, 2021

(Defamation, Defamation Per Se, and Defamation by Implication)

(Against The New York Times Company d/b/a The New York Times, Ellen Pollock, Lily Meier , Kashmir Hill , Aaron Krolik , Dr Todd Essig, John Does 1 through 20, XYZ Corporations 1 through 10)

193. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.

194. The story was posted at the URL

<https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html>

remains online at that location.

195. Defendants published or caused to be published false and defamatory statements in the “Woman Accused Of Defaming Dozens Online Is Arrested” , which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.

196. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.

197. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society

198. The defamatory statements in the “ Woman Accused Of Defaming Dozens Online Is Arrested “ are of and concerning Ms. Atas , and reasonably understood to be about Ms Atas .

199. The defamatory statements in “ Woman Accused Of Defaming Dozens Online Is Arrested “ are false.
200. The Times published the defamatory statements in the “ Woman Accused Of Defaming Dozens Online Is Arrested “ knowing that they are false or with reckless disregard for the truth of the statements.
201. The defamatory statements in the “ Woman Accused Of Defaming Dozens Online Is Arrested “ constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity ; specifically that she was putting peoples safety at risk
202. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas , the defamatory statements in the “ Woman Accused Of Defaming Dozens Online Is Arrested “ have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
203. The re-publication of the defamatory statements in the “ Woman Accused Of Defaming Dozens Online Is Arrested “ in other publications, as well as via the dissemination of the “ Woman Accused Of Defaming Dozens Online Is Arrested “ through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
204. Defendants’ conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award

of punitive damages.

**THIRD CAUSE OF ACTION FOR PUBLICATION OF “ The Slander
Industry” ON THE NEW YORK TIMES WEBSITE ON April 24, 2021
(Defamation, Defamation Per Se, and Defamation by Implication)
(Against The New York Times Company d/b/a The New York Times, Ellen Pollock,
Kashmir Hill , Aaron Krolik, John Does 1 through 20, XYZ Corporations 1
through 10)**

205. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.
206. The story was posted at the URL
<https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-web-sites.html> remains online at that location.
207. Defendants published or caused to be published false and defamatory statements in the “Woman Accused Of Defaming Dozens Online Is Arrested” , which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.
208. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.
209. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society

210. The defamatory statements in the “ The Slander Industry “ are of and concerning Ms. Atas , and reasonably understood to be about Ms Atas .
211. The defamatory statements in “ The Slander Industry“ are false.
212. The Times published the defamatory statements in the “ The Slander Industry “ knowing that they are false or with reckless disregard for the truth of the statements.
213. The defamatory statements in the “ The Slander Industry“ constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity ; specifically that she was putting peoples safety at risk
214. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas , the defamatory statements in the “ The Slander Industry “ have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
215. The re-publication of the defamatory statements in the “ The Slander Industry“ in other publications, as well as via the dissemination of the “ The Slander Industry “ through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
216. Defendants’ conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

FOURTH CAUSE OF ACTION FOR PUBLICATION OF “ CBC Radio The Current ” ON February 17, 2021

(Defamation, Defamation Per Se, and Defamation by Implication)

(Against The New York Times Company d/b/a The New York Times, Ellen Pollock, Kashmir Hill , John Does 1 through 20, XYZ Corporations 1 through 10)

217. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.

218. The story was posted at the URL

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652>

remains online at that location.

219. Defendants published or caused to be published false and defamatory statements in the “CBC Radio The Current” , which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.

220. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.

221. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society

222. The defamatory statements in the “ CBC Radio The Current “ are of and concerning Ms. Atas , and reasonably understood to be about Ms Atas .

223. The defamatory statements in “ CBC Radio The Current“ are false.
224. The Times published the defamatory statements in the “ CBC Radio The Current “ knowing that they are false or with reckless disregard for the truth of the statements
225. The defamatory statements in the “ CBC Radio The Current“ constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity ; specifically that she was putting peoples safety at risk
226. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas , the defamatory statements in the “ CBC Radio The Current “ have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
227. The re-publication of the defamatory statements in the “ CBC Radio The Current“ in other publications, as well as via the dissemination of the “ CBC Radio The Current “ through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
228. Defendants’ conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

FIFTH CAUSE OF ACTION FOR PUBLICATION OF “ The Daily ” ON

April 6, 2021 and May 3, 2021

(Defamation, Defamation Per Se, and Defamation by Implication)

(Against The New York Times Company d/b/a The New York Times, Ellen Pollock,

Kashmir Hill , Aaron Krolik , THE DAILY PODCAST, Michael Barbaro , John

Does 1 through 20, XYZ Corporations 1 through 10)

The podcast for April 6, 2021 was posted at the URL

<https://www.nytimes.com/2021/04/06/podcasts/the-daily/a-vast-web-of-vengeance-part-1.html> and remains online at that location.

229. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.

230. The podcast for May 3, 2021 was posted at the URL

<https://www.nytimes.com/2021/05/03/podcasts/the-daily/a-vast-web-of-vengeance-part-2.html> and remains online at that location.

231. Defendants published or caused to be published false and defamatory statements in the “The Daily” , which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.

232. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.

233. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society

234. The defamatory statements in the “ The Daily “ are of and concerning Ms. Atas , and reasonably understood to be about Ms Atas .
235. The defamatory statements in “ The Daily“ are false.
236. The Times published the defamatory statements in the “ The Daily“ knowing that they are false or with reckless disregard for the truth of the statements.
237. The defamatory statements in the “The Daily“ constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity ; specifically that she was putting peoples safety at risk
238. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas , the defamatory statements in the “ The Daily “ have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
239. The re-publication of the defamatory statements in the “ The Daily“ in other publications, as well as via the dissemination of the “ The Daily “ through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
240. Defendants’ conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

**SIXTH CAUSE OF ACTION FOR PUBLICATION OF “ In Lieu of Fun,
Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry
<https://www.youtube.com/watch?v=N0kRJYccifA> ” ON April 24, 2021**

(Defamation, Defamation Per Se, and Defamation by Implication)

**(Against The New York Times Company d/b/a The New York Times, Ellen Pollock,
Kashmir Hill , Aaron Krolik , John Does 1 through 20, XYZ Corporations 1
through 10)**

241. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.

242. The webcast for April 24, 2021 was posted at the URL
<https://www.youtube.com/watch?v=N0kRJYccifA> and remains online at that locat

243. Defendants published or caused to be published false and defamatory statements in the “The Daily” , which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.

244. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.

245. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in

society

246. The defamatory statements in the “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ are of and concerning Ms. Atas , and reasonably understood to be about Ms Atas .
247. The defamatory statements in “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ are false.
248. The Times published the defamatory statements in the “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ knowing that they are false or with reckless disregard for the truth of the statements.
249. The defamatory statements in the “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity ; specifically that she was putting peoples safety at risk
250. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas , the defamatory statements in the “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
251. The re-publication of the defamatory statements in the “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ in other publications, as well

as via the dissemination of the “ In Lieu of Fun, Episode 395: Aaron Krolik and Kashmir Hill and the Slander Industry “ through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants

252. Defendants’ conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

Negligent Supervision and/or Retention Against The New York Times

253. Plaintiff repeats and each and every allegation in the preceding paragraphs as if set forth at length herein.

254. Ellen Pollock, Kashmir Hill .,Aaron Krolik,Michael Barbaro are, and/or at all relevant times were, employees, officers, directors and/or agents of The New York Times.

255. The New York Times knew or should have known of the tortious propensities of Ellen Pollock, Kashmir Hill .,Aaron Krolik,Michael Barbaro prior to the occurrence of their tortious conduct at issue herein.

256. For example, The New York Times was aware that Craig, Barstow and Buettner had a vendetta against Plaintiff and were willing to commit tortious acts in furtherance of their desire to harm

257. Ellen Pollock, Kashmir Hill .,Aaron Krolik,Michael Barbaroengaged in tortious

conduct against Plaintiff on The

New York Times property and/or using the property of The Times.

258. In the alternative to The Times' vicarious liability for the actions of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro, as its employees, officers, directors and/or agents, The New York Times is liable for its negligent supervision and/or retention of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro

259. As a direct and proximate result of The New York Times negligent supervision and/or retention of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro, Plaintiff has sustained, and will continue to sustain, significant damages

260. 129. The New York Times is vicariously liable, under the doctrine of respondeat superior, for the tortious acts of its employees, officers, directors and/or agents, Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro, because it authorized, supervised, directed, participated in, consented to, and/or ratified the conduct, as described herein, of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro and/or because the conduct of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro as described herein, occurred within the scope of their employment with The New York Times.

261. The New York Times is vicariously liable, under the doctrine of respondeat superior, for the tortious acts of its employees, officers, directors and/or agents, Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro, because it authorized, supervised, directed, participated in, consented to, and/or ratified the conduct, as described herein, of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro and/or because the conduct of Ellen Pollock, Kashmir Hill, Aaron Krolik, Michael Barbaro as described herein, occurred within the scope of their employment with The Times.

262. The New York Times is vicariously liable, under the doctrine of respondeat

superior, for the tortious acts of its employees, officers, directors and/or agents, Ellen Pollock, Kashmir Hill .,Aaron Krolik,Michael Barbaro, because it authorized, supervised, directed, participated in, consented to, and/or ratified the conduct, as described herein, of Ellen Pollock, Kashmir Hill .,Aaron Krolik,Michael Barbaro and/or because the conduct of Ellen Pollock, Kashmir Hill .,Aaron Krolik,Michael Barbaro, as described herein, occurred within the scope of their employment with The New York Times.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Nadire Atas , demands judgment against defendants, The New York Times Company d/b/a The New York Times, Ellen Pollock, Lily Meier, Kashmir Hill , Dr, Todd Essig , THE DAILY PODCAST, Michael Barbaro, John Does 1 through 20, XYZ Corporations 1 through 10, jointly and severally, as follows:

- a) That judgment be entered against the Defendants for substantial compensatory damages in an amount not less than One Hundred Million Dollars (\$100,000,000.00);
- b) Punitive damages in the amount of Four Hundred Million Dollars (\$400,000,000.00;)
- c) All taxable litigation costs, pre-judgment interest, and post-judgment interest; and
- d) For an award of interest, costs, expenses and attorneys' fees pursuant to statute; and
- e) For such other relief as this Court may deem fair, equitable and just.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury as to all issues so triable.

Dated: December 14, 2022 Respectfully Submitted

Nadire Atas
411- 11 Thorncliffe Park Dr
Toronto, ON M4H 1P3